

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

CAMILLE FEHRING,

Plaintiff,

Case No.: 21-CV-0001

v.

SHOREWOOD SCHOOL DISTRICT
and ABC INSURANCE COMPANY,

Defendants.

**JOINT CIVIL L.R. 7(h) EXPEDITED NON-DISPOSITIVE MOTION TO AMEND
TRIAL SCHEDULING ORDER**

By this joint motion, Plaintiff Camille Fehring and Defendant Shorewood School District (“Shorewood”) respectfully move this Court, pursuant to Civil L.R. 7(h), to amend the Trial Scheduling Order in this matter, Dkt. 14, pursuant to Fed. R. Civ. P. 16(b)(4), on the grounds that the departure of Plaintiff’s prior counsel has caused unforeseen delays in completing discovery in this case.

Plaintiff’s case was being handled by Attorney Carlos R. Pastrana of Cade Law Group, LLC. On December 28, 2021 Attorney Annalisa Pusick, also of Cade Law Group, LLC, filed a notice of withdrawal for Attorney Pastrana. On the same date, Attorney Pusick filed a notice of appearance on behalf of Plaintiff. Neither Ms. Pusick, nor Mr. Cade, who has also appeared in this case, were prepared for Mr. Pastrana’s withdrawal. As a result, Plaintiff was not able to immediately continue ongoing discovery, including depositions of witnesses.

On March 23, 2022, Attorney Cade and Attorney Devin S. Hayes conferred via phone regarding the case status, upcoming deadlines, and the insufficient factual record to date that

requires additional discovery to be completed. The parties believe that additional time will be needed in order to effectively prepare this case for summary judgment and/or trial. The parties request that the following modifications be made to the Trial Scheduling Order:

1. Dispositive motions to be due by September 30, 2022.
2. The jury trial to be rescheduled to February 20, 2023 or later.
3. The final pretrial conference to be re-scheduled for the week before the new trial date.

The parties request that a scheduling conference be held to determine the new trial date based upon the Court's schedule and availability of all parties. The parties also agree to extend the deadline for non-expert discovery, from the parties' joint Rule 26(f) report, to July 15, 2022.

For the foregoing reasons, the Parties respectfully request that the Court modify the scheduling order as set forth above.

DATED this 24th day of March, 2022.

s/ Nathaniel Cade, Jr.

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s/ Devin S. Hayes

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